

EXHIBIT A



August 17, 2023

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Palo Alto, CA
San Diego, CA
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Hong Kong
Singapore
London, United Kingdom
Brussels, Belgium

Invoice Number: 2704228

338278-201

Bankruptcy

For services rendered through June 30, 2023

Fees	\$	660,218.60
Chargeable costs and disbursements	\$	2,618.47
Total Due on Current Invoice (USD)	\$	662,837.07

To protect against wire fraud attacks, wiring instructions will not be changed during this transaction.
If you receive updated wire transfer instructions that do not agree to the information on this invoice,
please contact a member of Accounting-Accounts Receivable.
Cooley's public website includes firm office phone numbers.



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For services rendered through June 30, 2023 :

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
ASSET ANALYSIS AND RECOVERY				
06/02/23	Evan M. Lazerowitz	Review and revise SOFAs/Schedules	1.40	
06/09/23	Evan M. Lazerowitz	Finalize schedules/SOFAs for filing	2.20	
Task Total:			3.60	4,464.00
ASSET DISPOSITION				
06/06/23	Paul J. Springer	Review Invictus proposal to Carnival re bid pro resolution (.1); review correspondence between Invictus counsel and Carnival counsel re same (.1)	0.20	
06/06/23	Evan M. Lazerowitz	Call with Carnival re: bidding procedures	1.00	
06/07/23	Paul J. Springer	Review correspondence and markups from Proskauer, Potter, and Orrick re bid pro resolution	0.30	
06/07/23	Meredith R. Klionsky	Review IP addendum	0.40	
06/07/23	Marquavious A. Strozier	Review service agreement addendum (.4); correspondence re same with internal team (.7)	1.10	
06/08/23	Aaron D. Binstock	Correspondence with client re IP clean-up	0.10	
06/08/23	Paul J. Springer	Correspondence with Orrick and Proskauer re bid pro order	0.10	
06/08/23	Evan M. Lazerowitz	Revise bidding procedures order	1.80	
06/08/23	Marquavious A. Strozier	Draft schedule of contracts and cure costs (1.7); review diligence materials (1.3); correspondence re same with internal team (1.4)	4.40	
06/09/23	Meredith R. Klionsky	Review and revise cure schedule	0.40	
06/09/23	Paul J. Springer	Review revised bid pro order (.2); correspondence with Proskauer re same (.1); correspondence with Potter and Orrick re same (.1)	0.40	
06/09/23	Marquavious A. Strozier	Revise schedule of contracts and cure costs (1.8); review diligence materials (.9)	2.70	



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06/10/23	Paul J. Springer	Correspondence with Proskauer re bid pro order	0.10
06/10/23	Marquavious A. Strozier	Revise contract cure schedule	0.80
06/11/23	Paul J. Springer	Correspondence with Orrick, Proskauer, and E. Lazerowitz re bid pro order	0.20
06/11/23	Cullen D. Speckhart	Review materials and communications related to asset ownership dispute	1.10
06/12/23	Cullen D. Speckhart	Call re asset ownership analysis	0.60
06/12/23	Aaron D. Binstock	Correspondence with local counsel re engagement status	0.20
06/12/23	Paul J. Springer	Correspondence with Orrick (.1) and Proskauer (.1) re bid pro order; correspondence with E. Lazerowitz re same (.1); review Carnival letter to court re same (.1)	0.40
06/12/23	Evan M. Lazerowitz	Call with Proskauer re: sale issues	1.00
06/12/23	Cristina L. DeBiase	Draft DCL source code escrow agreement	2.60
06/12/23	Evan M. Lazerowitz	Correspond with Carnival re: bidding procedures order	0.50
06/12/23	Evan M. Lazerowitz	Revise bidding procedures order	1.60
06/12/23	Evan M. Lazerowitz	Review and revise cure schedule	0.50
06/13/23	Meredith R. Klionsky	Review cure schedule	0.30
06/13/23	Aaron D. Binstock	Coordinate with M. Klionsky re schedules	0.20
06/13/23	Paul J. Springer	Review letter to court re bid pro order (.1); review Carnival reply letter to same (.1)	0.20
06/13/23	Nicholas R. Perez	Update cure schedule with employment contract data	1.40
06/13/23	Cristina L. DeBiase	Revise DCL source code escrow agreement based on client comments	1.00
06/13/23	Evan M. Lazerowitz	Prepare letter to chambers re: bidding procedures (1.7); review Carnival's response letter (0.4)	2.10
06/13/23	Marquavious A. Strozier	Revise schedule of contracts and cure costs (1.1); correspondence re same with internal team (.3)	1.40
06/14/23	Meredith R. Klionsky	Attend call re cure costs schedule	0.50



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06/14/23	Leo J. Spicer-Phelps	Review escrow agreement	0.20	
06/14/23	Marquavious A. Strozier	Attend call re schedule of contracts	0.80	
06/15/23	Cristina L. DeBiase	Finalize DCL escrow agent agreement	1.20	
06/15/23	Leo J. Spicer-Phelps	Review Escrow Agreements (.3); call with C. DeBiase in support of same (.4)	0.70	
06/23/23	Paul J. Springer	Review correspondence (.1) and spreadsheet (.1) from Orrick re disputed property; review carnival complaint re declaratory relief (.3)	0.50	
06/29/23	Paul J. Springer	Review opening brief and related declaration i/c/w ownership dispute re sale	0.50	
Task Total:			33.50	35,641.50

BUSINESS OPERATIONS

06/02/23	Evan M. Lazerowitz	Weekly call with Disney	1.00	
06/09/23	Evan M. Lazerowitz	Weekly call with Disney	1.00	
06/16/23	Evan M. Lazerowitz	Weekly call with Disney	1.00	
Task Total:			3.00	3,720.00

CASE ADMINISTRATION

06/01/23	Denise Cahir	Communications with E. Lazerowitz re 341 meeting (0.1); follow-up communications with L. Huber (Potter) re same (0.1)	0.20	
06/02/23	Michael Aaron Klein	Calls with Cooley team re: strategic alternatives	1.40	
06/03/23	Michael Aaron Klein	Numerous calls and emails re: conversion motion and potential litigation over DIP dispute and status of case	1.30	
06/03/23	Evan M. Lazerowitz	Revise conversion motion	1.50	
06/05/23	Denise Cahir	Prepare materials re bidding procedures and stay relief for review by S. Smith	2.30	
06/05/23	Denise Cahir	Register participants for June 7, 2023 omnibus hearing	0.10	
06/06/23	Aaron D. Binstock	Correspondence with client re local counsel engagement	0.10	



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06/06/23	Denise Cahir	Communications with L. Huber (Potter) re June 7, 2023 hearing	0.10
06/06/23	Denise Cahir	Communications with E. Lazerowitz re June 7, 2023 hearing preparation	0.10
06/08/23	Michael Aaron Klein	Calls and emails re: status of sale/DIP/mediation processes	0.90
06/11/23	Cullen D. Speckhart	Review emails from counsel to Carnival re inucus and sale timeline	0.40
06/12/23	Michael Aaron Klein	Update calls and emails re: case status and negotiations with all parties re: sale process/DIP/mediation	1.00
06/13/23	Cullen D. Speckhart	Review information and materials related to financing issues and information in support of case status	1.80
06/13/23	Paul J. Springer	Review E. Lazerowitz case status board update email	0.10
06/13/23	Evan M. Lazerowitz	Draft update to board on case status	0.50
06/14/23	Denise Cahir	Calendar June 15, 2023 status conference	0.10
06/15/23	Michael Aaron Klein	Calls and emails re: latest developments, with focus on lift stay	0.60
06/15/23	Denise Cahir	Review bar date order and calendar related deadlines	0.20
06/16/23	Denise Cahir	Calendar July 20, 2023 omnibus hearing	0.10
06/17/23	Cullen D. Speckhart	Multiple calls with client and emails with internal team re outstanding case issues	2.50
06/17/23	Cullen D. Speckhart	Review materials related to Carnival dispute issues	0.50
06/18/23	Cullen D. Speckhart	Follow up with client and team	0.50
06/18/23	Cullen D. Speckhart	Review emails and materials related to DIP financing agreement	1.30
06/20/23	Denise Cahir	Review deposition notices and calendar relevant deadlines (0.2); communications with E. Lazerowitz re same (0.1)	0.30
06/20/23	Denise Cahir	Calendar continued 341 meeting	0.10
06/20/23	Denise Cahir	Communications with N. Groombridge re June 21, 2023 status conference (0.1); communications with L. Huber (Potter) re	0.20



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		same (0.1)	
06/21/23	Cullen D. Speckhart	Multiple calls and emails re case status and financing issues	2.50
06/21/23	Paul J. Springer	Correspondence with Company and advisor team re potential conversion (.1); review draft conversion motion (.2)	0.30
06/21/23	Denise Cahir	Communications with B. Aghevli re transmittal of discovery (0.1); set up file transfer link (0.1); download files (0.2)	0.40
06/22/23	Michael Aaron Klein	Contingency planning in light of recent developments	1.30
06/22/23	Paul J. Springer	Comment on revised conversion motion (.3); correspondence with Potter re motion to shorten for same (.1)	0.40
06/23/23	Michael Aaron Klein	Numerous confs re: latest developments with internal team	0.80
06/23/23	Mollie N. Canby	Circulate copy of Carnival complaint to E. Lazerowitz	0.10
06/23/23	Denise Cahir	Transmit confidential documents in connection with rejection motion (0.2); communications with E. Lazerowitz and various parties at Orrick re same (0.2)	0.40
06/23/23	Denise Cahir	Update calendar and critical dates memo re adjournment of hearing on rejection motions	0.20
06/23/23	Denise Cahir	Review DIP Final Order and update critical dates memo in connection with milestones (0.5); communications with E. Lazerowitz re same (0.1)	0.60
06/24/23	Denise Cahir	Communications with E. Lazerowitz re complaint filed by Carnival	0.10
06/24/23	Denise Cahir	Communications with A. Penfield (Groombridge) re request for bankruptcy hearing transcripts	0.20
06/26/23	Denise Cahir	Communications with E. Lazerowitz re critical dates memo	0.10
06/28/23	Cullen D. Speckhart	Discuss same with E. Lazerowitz	0.30
06/28/23	Cullen D. Speckhart	Review matters pertaining to company case status	0.80



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06/28/23	Michael Aaron Klein	Review numerous emails re: latest developments in support of case with internal team	0.70
06/28/23	Denise Cahir	Calendar Fournier deposition	0.10
06/29/23	Denise Cahir	Draft Cooley's first monthly fee application (1.2); communications with A. Lindner re same (0.2)	1.40
Task Total:			28.90 34,057.00

CLAIMS

06/02/23	Jacquelyn M. Burke	Call with E. Lazerowitz re: potential D&O claim for conversion to Chapter 7	0.60
06/05/23	Paul J. Springer	Correspondence with Foley re CNB claims	0.10
06/05/23	Jacquelyn M. Burke	Call with J. Carino re: products liability renewal	0.50
06/05/23	Stephen R. Smith	Analysis and discussions re opposition to motion to stay and hearing re same	1.80
06/06/23	Paul J. Springer	Correspondence with E. Lazerowitz re Ropes asserted claim (.2); correspondence with J. Carino re same (.1)	0.30
06/06/23	Stephen R. Smith	Prepare for and participate in JDG call (.7); prepare for and participate in call with Carnival (.8); prepare for oral hearing on motion to lift stay (3)	4.50
06/07/23	Paul J. Springer	Correspondence with J. Carino and E. Lazerowitz re Virgin indemnity claims	0.20
06/07/23	Stephen R. Smith	Prepare for hearing (1); participate in hearing (5); follow up issues from same (1)	7.00
06/08/23	Paul J. Springer	Correspondence with J. Carino and Province re indemnification claims (.7); review documents re same (.3)	1.00
06/08/23	Stephen R. Smith	Follow up issues from hearing (.4); attention to discovery issues (.5)	0.90
06/12/23	Stephen R. Smith	Prepare for and participate in call with IP trial counsel	1.00
06/14/23	Paul J. Springer	Correspondence with E. Lazerowitz re indemnification claims	0.20



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06/19/23	Paul J. Springer	Review correspondence from M. Shoemake re Peritum claims	0.10	
Task Total:			18.20	28,009.50

FEE/EMPLOYMENT APPLICATIONS

06/07/23	Paul J. Springer	Review revised Groombridge retention order	0.10	
06/15/23	Amanda L. Lindner	Correspond with internal team re fee application preparation and review interim fee order in support of same	0.40	
Task Total:			0.50	391.50

COOLEY FEE APPLICATION

06/17/23	Amanda L. Lindner	Review fee application in compliance with UST guidelines	0.60	
06/18/23	Amanda L. Lindner	Review fee application in compliance with UST guidelines	1.30	
06/19/23	Amanda L. Lindner	Review fee application in compliance with UST guidelines	3.70	
06/20/23	Amanda L. Lindner	Correspond with internal team re fee application	0.50	
06/21/23	Amanda L. Lindner	Correspond with internal team re fee application	0.60	
06/22/23	Amanda L. Lindner	Review motion to convert (.4); and provide comments to team in support of same (.3); revise same (.5)	1.20	
06/23/23	Amanda L. Lindner	Correspond with internal team re fee application	0.90	
06/29/23	Amanda L. Lindner	Correspond with internal team in support of fee application (.8)	0.80	
06/30/23	Amanda L. Lindner	Correspond with internal document review team in support of billing protocol and fee application	0.30	
06/30/23	Amanda L. Lindner	Draft fee application (1.3); correspond with internal team in support of same (.7); further draft fee application (1.3)	3.30	



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		Task Total:	13.20	8,844.00

OTHER FEE APPLICATIONS

06/27/23	Amanda L. Lindner	Review province fee application (.4); correspond with E. Lazerowitz re same (.1)	0.50	
		Task Total:	0.50	335.00

FEE/EMPLOYMENT OBJECTIONS

06/01/23	Paul J. Springer	Review UST objection to Province retention app (.2); correspondence with Potter re same (.1); review revised proposed order for same (.1)	0.40	
06/02/23	Paul J. Springer	Review Groombridge reply i/c/w its retention app	0.20	
		Task Total:	0.60	741.00

FINANCING AND CASH COLLATERAL

06/01/23	Paul J. Springer	Correspondence with C. Speckhart, Province, and Company re status of DIP	0.20	
06/01/23	Evan M. Lazerowitz	Call with Proskauer re: adequate protection issues	0.50	
06/01/23	Evan M. Lazerowitz	Revise DIP documents	1.70	
06/01/23	Marquavious A. Strozier	Review diligence requests (2.1); correspondence re service agreement amendment (.2)	2.30	
06/02/23	Evan M. Lazerowitz	Call with Corbin re: cash collateral	0.50	
06/02/23	Evan M. Lazerowitz	Call with Invictus re: cash collateral	0.70	
06/02/23	Marquavious A. Strozier	Correspondence re diligence requests with internal team	0.10	
06/03/23	Michael Aaron Klein	Numerous calls and emails re: supplemental interim DIP	1.00	
06/04/23	Bryan Y. Liu	Conduct correspondence re borrowing notice	0.20	
06/04/23	Paul J. Springer	Review amended interim DIP order (.1); correspondence with E. Lazerowitz re same	0.30	



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		(.1); correspondence with X. Li re DIP borrowing notice (.1)	
06/04/23	Evan M. Lazerowitz	Prepare amended interim DIP order	1.70
06/04/23	Xueqing Li	Prepare borrowing notice	0.50
06/05/23	Marquavious A. Strozier	Respond to diligence requests (.8); correspondence re service agreement addendum with internal team (1.1)	1.90
06/05/23	Xueqing Li	Prepare borrowing notice	0.40
06/14/23	Evan M. Lazerowitz	Call with B.Finestone re: adequate protection (0.4); call with Province re: same (0.6)	1.00
06/16/23	Evan M. Lazerowitz	Revise final DIP order	2.30
06/18/23	Paul J. Springer	Review final DIP documents (.2); correspondence with E. Lazerowitz re same (.1)	0.30
06/19/23	Paul J. Springer	Correspondence with E. Lazerowitz re finalizing DIP	0.10
06/19/23	Evan M. Lazerowitz	Finalize DIP credit agreement and order	1.60
06/20/23	Paul J. Springer	Correspondence with E. Lazerowitz, Company, and Potter re finalizing DIP order (.2); internal correspondence re DIP borrowing notice (.1)	0.30
06/20/23	Evan M. Lazerowitz	Prepare budget and DIP order for filing	1.40
06/20/23	Xueqing Li	Review final DIP order borrowing notice	0.50
06/21/23	Evan M. Lazerowitz	Call with Proskauer re: financing	0.60
06/22/23	Paul J. Springer	Confer with Company and advisor team re DIP (partial) (.4); correspondence with same re same (.3)	0.70
06/22/23	Evan M. Lazerowitz	Multiple calls with company and other creditors re: supplemental funding	2.60
06/23/23	Paul J. Springer	Review revised DIP documents and order	0.20
06/23/23	Evan M. Lazerowitz	Revise final DIP order	3.20
06/26/23	Bryan Y. Liu	Review emails re DIP borrowing	0.20
06/26/23	Paul J. Springer	Correspondence with internal team (.1) and Proskauer (.1) re DIP borrowing	0.20
06/26/23	Xueqing Li	Review DIP loan borrowing notice	0.60



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06/27/23	Evan M. Lazerowitz	Revise DIP-related funding agreements	2.30
06/29/23	Xueqing Li	Prepare borrowing notice	0.50
06/30/23	Paul J. Springer	Correspondence with E. Lazerowitz re DIP borrowing	0.10
Task Total:			30.70 35,302.00

LITIGATION

06/01/23	Matthew Thompson	Data intake, processing, QC, and release of processed documents in support of document review	0.70
06/01/23	Paul J. Springer	Review draft mediation statement (.3); correspondence with Company, internal team, Proskauer, and other advisors re comments to same (.2)	0.50
06/01/23	Evan M. Lazerowitz	Review documents ISO privilege review	3.00
06/01/23	Beth Shrieves	Continue reviewing documents for production	2.30
06/01/23	Beth Shrieves	Review Groombridge Wu agreements for production	0.50
06/01/23	Beth Shrieves	Confer with e-discovery team re additional documents collected for Relativity	0.40
06/01/23	Cullen D. Speckhart	Analysis of legal issues involved in financing disputes, discuss same with E. Lazerowitz	2.40
06/02/23	Amanda L. Lindner	Review correspondence with US Trustee (.1); correspond with E. Lazerowitz re supplemental declaration (.1); correspond with C. Speckhart re same (.1); correspond with Potter Anderson re supplemental declaration filing (.1)	0.40
06/02/23	Matthew Thompson	Prepare, QC, and release saved search to identify documents as requested by B. Shrieves	0.30
06/02/23	Evan M. Lazerowitz	Revise mediation statement	2.30
06/02/23	Cullen D. Speckhart	Multiple calls and emails with Cooley team, client and Proskauer re financing disputes and potential impact for Carnival litigation	3.40
06/02/23	Beth Shrieves	Correspond with B. Bobroff re common interest privilege and protective order	0.40



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06/02/23	Beth Shrieves	Continue reviewing documents for production	1.40
06/03/23	Amanda L. Lindner	Discuss mot to dismiss with E. Lazerowitz (.4) Draft motion to convert (3.6); correspondence with E. Lazerowitz (.4); further review and draft motion to convert (1.5)	5.90
06/03/23	Cullen D. Speckhart	Call with counsel for Corbin, further work re interim DIP draw	1.50
06/03/23	Cullen D. Speckhart	Several calls with client and Proskauer re outstanding financing disputes	1.30
06/04/23	Michael Aaron Klein	Mediation prep	1.20
06/04/23	Amanda L. Lindner	Correspond with E. Lazerowitz re case update	0.20
06/04/23	Evan M. Lazerowitz	Call with board re: mediation preparation	0.70
06/04/23	Cullen D. Speckhart	Draft email to Proskauer re financing issues	0.60
06/04/23	Cullen D. Speckhart	Emails to board members re status of interim financing request	0.50
06/05/23	Michael Aaron Klein	Review Carnival reply brief ISO stay relief motion	0.80
06/05/23	Paul J. Springer	Correspondence with Orrick (.1) and E. Lazerowitz (.1) re witness lists; review carnival witness list (.1); review Debtors' witness list (.1)	0.40
06/05/23	Evan M. Lazerowitz	Call with A.Penfield and B.Shrieves re: Carnival discovery	0.40
06/05/23	Evan M. Lazerowitz	Attend mediation	3.70
06/05/23	Evan M. Lazerowitz	Prepare witness and exhibit list for June 7 hearing	0.40
06/05/23	Cullen D. Speckhart	Prepare for and participate in mediation, follow up with clients in support of same	5.50
06/05/23	Beth Shrieves	Confer with E. Lazerowitz and A. Penfield re offensive discovery requests to Carnival	0.50
06/05/23	Beth Shrieves	Continue reviewing documents for production	3.20
06/06/23	Paul J. Springer	Correspondence with E. Lazerowitz and Orrick team re witness testimony (.2); review Carnival exhibit list (.1); call with Orrick team re hearing protocol for evidence (.3)	0.60



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06/06/23	Cullen D. Speckhart	Discuss numerous litigation matters related to carnival ownership dispute with Potter and Cooley IP Team	2.10
06/06/23	Beth Shrieves	Attend meet and confer with Carnival in advance of hearing	0.50
06/06/23	Beth Shrieves	Research and draft motion in limine to limit the testimony of D. Fournier	1.80
06/06/23	Beth Shrieves	Review Carnival's list of exhibits	0.50
06/07/23	Evan M. Lazerowitz	Review documents ISO production	2.50
06/07/23	Beth Shrieves	Continue reviewing collected documents for production	4.60
06/07/23	Beth Shrieves	Correspond with D. Knight and e-discovery team re document production	0.30
06/08/23	Evan M. Lazerowitz	Call with D.Knight and B.Shrieves re: discovery	0.70
06/08/23	Evan M. Lazerowitz	Review documents ISO Carnival production	3.50
06/08/23	Dustin M. Knight	Conduct privilege review of De Curtis draft documents	2.90
06/08/23	Beth Shrieves	Continue reviewing documents for production	2.60
06/08/23	Beth Shrieves	Confer with D. Knight and E. Lazerowitz re case status and updates	0.50
06/09/23	Matthew Thompson	Analysis and response related to workspace and matter questions as requested by D. Knight	0.30
06/09/23	Paul J. Springer	Correspondence with E. Lazerowitz and Company re status of mediation	0.10
06/09/23	Evan M. Lazerowitz	Review documents ISO Carnival production	2.30
06/09/23	Dustin M. Knight	Conduct privilege review of De Curtis draft documents	5.10
06/09/23	Cullen D. Speckhart	Review revisions to bidding procedures received from counsel for Carnival	0.60
06/12/23	Cullen D. Speckhart	Analyze potential options to resolve	1.10
06/12/23	Cullen D. Speckhart	Review emails related to bidding process and dispute re same with Carnival	0.60
06/12/23	Matthew Thompson	Prepare updated coding panel based on required fields, choices, and layout styles as	0.30



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		requested by D. Knight	
06/12/23	Evan M. Lazerowitz	Call with GWBS re: Carnival dispute	0.70
06/12/23	Evan M. Lazerowitz	Call with Invictus re: Carnival discovery	0.50
06/12/23	Evan M. Lazerowitz	Revise confidentiality order for Carnival production	0.60
06/12/23	Evan M. Lazerowitz	Draft proposal re: property ownership trial	1.60
06/12/23	Dustin M. Knight	Conduct privilege review of De Curtis draft documents	1.40
06/12/23	Beth Shrieves	Correspond internally re document review	0.50
06/13/23	Michael Aaron Klein	Confer with team re: responses to pending discovery	0.30
06/13/23	Matthew Thompson	Prepare, QC, and release saved searches to identify requests documents for pre-production PDF review of privilege documents (.8); Build document branding set, export branded PDFs, release to review team for internal review (.4)	1.20
06/13/23	Matthew Thompson	Prepare saved searches to identify documents for PDF production, apply bates branding, confidentiality branding, document rename, QC, in support of doc review	2.00
06/13/23	Paul J. Springer	Correspondence with Company re mediation status	0.10
06/13/23	Amanda L. Lindner	Correspond with internal team case status updates	0.30
06/13/23	Evan M. Lazerowitz	Call with Invictus and Debtors re: Carnival dispute	1.00
06/13/23	Hitesh Patel	Assist with pending set-up of document review effort (.7); participate in call with case team regarding document review preparation (.5)	1.30
06/13/23	Evan M. Lazerowitz	Review documents ISO property ownership dispute	2.00
06/13/23	Dustin M. Knight	Conduct privilege review of De Curtis draft documents (3.2); revise protective order (.9); develop document review plan for contract attorneys (.7)	4.80
06/14/23	Cullen D. Speckhart	Coordinate with Evan and team re status	0.70



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		conference on bidding procedures	
06/14/23	Cullen D. Speckhart	Call with E. Lazerowitz re current status of financing matters	0.40
06/14/23	Matthew Thompson	Production QC related to production documents as identified in saved searches approved by team, review of document bates, confidentiality, and redactions	1.00
06/14/23	Paul J. Springer	Correspondence with Potter re status of mediation	0.10
06/14/23	Amanda L. Lindner	Correspond with internal team re fee application preparation (.3); review information court documents in support of fee application deadlines (.2)	0.50
06/14/23	Hitesh Patel	Assist case team with pending document review effort (1.1); participate in internal call regarding document review logistics (.4); create document level searches for case team (.2)	1.70
06/14/23	Evan M. Lazerowitz	Review documents ISO production	1.60
06/14/23	Dustin M. Knight	Conduct privilege review of De Curtis draft documents	1.70
06/15/23	Michael E. Herring	Discuss overview of OSHA litigation with B. Shrieves (2.1); acquire access to workspace and prepare for document review (1.6)	3.70
06/15/23	Matthew Thompson	Review status of matter requests and analysis related to ongoing matter details, communications, received tasks, and request progress in support of document review	0.50
06/15/23	Matthew Thompson	Meeting related to matter status, updates, ongoing requests, and pre-contract reviewer kickoff in support of document review	0.50
06/15/23	Matthew Thompson	Meeting related to matter status updates, review progress, upcoming deadlines, and ongoing requests in support of document review	0.30
06/15/23	Hitesh Patel	Participate in call with case team regarding pending document review set-up (.3); prepare document review work flow for case team (.4); prepare document review database for case team utility prepare for pending launch	2.10



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		of document review (1.4)	
06/15/23	Evan M. Lazerowitz	Revise document review protocol	0.70
06/15/23	Evan M. Lazerowitz	Revise proposed case scheduling order	1.10
06/15/23	Beth Shrieves	Confer internally re contractor document review and privilege review	1.00
06/15/23	Beth Shrieves	Revise draft protective order	0.50
06/15/23	Beth Shrieves	Resolve coding issues for document production	1.00
06/15/23	Beth Shrieves	Draft document review protocol for contractor review	3.00
06/16/23	Michael E. Herring	Attend reviewer orientation (1.0); document review for 6/23 production (5.0)	6.00
06/16/23	Paul J. Springer	Confer with Cooley, Proskauer, and Orrick re briefing and hearing scheduling (1.2); follow up confer with D. Fornier re same (.3); review proposed case schedule (.2)	1.70
06/16/23	Amanda L. Lindner	Correspond with internal team re fee application preparation	0.10
06/16/23	Matthew Thompson	Meeting related to reviewer team training for matter details, protocol details, coding panel work flows, and additional information in support of document review	0.70
06/16/23	Matthew Thompson	Prepare, QC, and release search term reports to identify documents with terms for exclusion from batches	0.80
06/16/23	Yvonne G. Carlile	Review documents for responsiveness and privilege	8.00
06/16/23	Christian L. Ornelas	Review documents for responsiveness and privilege	4.80
06/16/23	Sarah G. Garris	Review documents for responsiveness and privilege	9.00
06/16/23	Robert D. Breen	Review documents for responsiveness and privilege	8.00
06/16/23	Lisa P. Dennis	Review documents for responsiveness and privilege	6.90
06/16/23	Jee-Hyeon J. Kim	Review documents for responsiveness and privilege	8.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/16/23	Alejandrina M. Luna	Review documents for responsiveness and privilege	7.00
06/16/23	Johann T. Toucet	Review documents for responsiveness and privilege	6.00
06/16/23	Todd W. Hutton	Review documents for responsiveness and privilege	8.00
06/16/23	Brittany A. Sterling	Review documents for responsiveness and privilege	5.00
06/16/23	Evan M. Lazerowitz	Meet and confer with Carnival re: schedule	0.50
06/16/23	Evan M. Lazerowitz	Call with Invictus and GWBS re: Carnival dispute	0.60
06/16/23	Hitesh Patel	Assist case team with set-up of document review (.3); participate in document review training call (.5); provide document level searches to assist case team (1.6)	2.40
06/16/23	Evan M. Lazerowitz	Draft letter to Proskauer re: case status	1.30
06/16/23	John M. Schlenz	Create and edit privilege log entries and redact privilege documents	4.00
06/16/23	Beth Shrieves	Train contract attorneys on responsiveness and privilege document review	1.00
06/16/23	Beth Shrieves	Continue reviewing documents for production and resolve contractor questions	1.50
06/16/23	Beth Shrieves	Revise and finalize document review protocol	0.60
06/17/23	Yvonne G. Carlile	Review documents for responsiveness and privilege	7.00
06/17/23	Christian L. Ornelas	Review documents for responsiveness and privilege	6.50
06/17/23	Sarah G. Garriss	Review documents for responsiveness and privilege	7.00
06/17/23	Robert D. Breen	Review documents for responsiveness and privilege	6.00
06/17/23	Lisa P. Dennis	Review documents for responsiveness and privilege	5.50
06/17/23	Jee-Hyeon J. Kim	Review documents for responsiveness and privilege	4.50
06/17/23	Johann T. Toucet	Review documents for responsiveness and privilege	3.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/17/23	Alejandrina M. Luna	Review documents for responsiveness and privilege	4.50
06/17/23	Todd W. Hutton	Review documents for responsiveness and privilege	8.00
06/17/23	Brittany A. Sterling	Review documents for responsiveness and privilege	8.00
06/17/23	Beth Shrieves	Assist with contractor review questions	0.60
06/18/23	Cullen D. Speckhart	Conference call with Orricle re contract rejection	0.50
06/18/23	Cullen D. Speckhart	And disputes with Carnival over license rejection	2.90
06/18/23	Yvonne G. Carlile	Review documents for responsiveness and privilege	6.20
06/18/23	Christian L. Ornelas	Review documents for responsiveness and privilege	1.70
06/18/23	Sarah G. Garris	Review documents for responsiveness and privilege	4.00
06/18/23	Robert D. Breen	Review documents for responsiveness and privilege	8.00
06/18/23	Lisa P. Dennis	Review documents for responsiveness and privilege	0.70
06/18/23	Jee-Hyeon J. Kim	Review documents for responsiveness and privilege	8.00
06/18/23	Alejandrina M. Luna	Review documents for responsiveness and privilege	4.50
06/18/23	Todd W. Hutton	Review documents for responsiveness and privilege	8.00
06/18/23	Brittany A. Sterling	Review documents for responsiveness and privilege	8.00
06/18/23	Hitesh Patel	Monitor status of document review effort	0.80
06/19/23	Michael Aaron Klein	Review papers and confer with team re: motion to reject and motion to compel (1.5); numerous confs with team re: same (1.6); strategize regarding upcoming hearing and potential discovery re: same (.5)	3.60
06/19/23	Cullen D. Speckhart	Review draft pleadings prepared in response to Carnival position on rejection, discuss arguments with E. Lazerowitz	3.30



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/19/23	Paul J. Springer	Review Carnival's proposed schedule for sale-related litigation	0.20
06/19/23	Yvonne G. Carlile	Review documents for responsiveness and privilege	6.40
06/19/23	Christian L. Ornelas	Review documents for responsiveness and privilege	3.20
06/19/23	Robert D. Breen	Review documents for responsiveness and privilege	5.50
06/19/23	Lisa P. Dennis	Review documents for responsiveness and privilege	1.10
06/19/23	Jee-Hyeon J. Kim	Review documents for responsiveness and privilege	0.50
06/19/23	Alejandrina M. Luna	Review documents for responsiveness and privilege	2.40
06/19/23	Johann T. Toucet	Review documents for responsiveness and privilege	2.00
06/19/23	Todd W. Hutton	Review documents for responsiveness and privilege	5.00
06/19/23	Brittany A. Sterling	Review documents for responsiveness and privilege	1.00
06/19/23	Hitesh Patel	Assist with document review work flow (.4); create review work flow for internal team (.6); prepare documents for production and privilege log (.8)	1.80
06/19/23	John M. Schlenz	Create and edit privilege log entries and redact privilege documents	6.70
06/19/23	Beth Shrieves	Continue reviewing and revising set of documents for production	2.50
06/19/23	Beth Shrieves	Correspond internally re discovery deadlines	0.30
06/20/23	Michael E. Herring	Redaction & privilege logging	9.40
06/20/23	Michael Aaron Klein	Review discovery demands and other requests from Carnival and confer with EL and CDS re: same	2.00
06/20/23	Paul J. Springer	Review additional production demands from Carnival (.2); correspondence with E. Lazerowitz and B. Shrieves re same (.1); correspondence with Groombridge and Orrick re litigation schedule proposals (.2)	0.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/20/23	Evan M. Lazerowitz	Call with Carnival re: briefing schedule (0.5); call with GWBS and Invictus re: same (0.6)	1.10
06/20/23	Hitesh Patel	Adjust document review work flow for pending production and privilege log (1.1); assist with set up of privilege log effort (.6)	1.70
06/20/23	Evan M. Lazerowitz	Review documents ISO production	3.20
06/20/23	Evan M. Lazerowitz	Revise proposed case schedule	0.80
06/20/23	John M. Schlenz	Create and edit privilege log entries	7.30
06/20/23	Beth Shrieves	Correspond with E. Wertheim re discovery status and confidentiality agreement	0.30
06/20/23	Beth Shrieves	Continue reviewing and begin redacting documents for production	2.30
06/21/23	Michael Aaron Klein	Calls and emails and review research re: 365(n) issues in dispute with Carnival (1.1); review DIP issues and potential conversion (1.0)	2.10
06/21/23	Michael E. Herring	Redaction & privilege logging	8.50
06/21/23	Paul J. Springer	Correspondence with Groombridge and Orrick re trial scheduling proposals	0.20
06/21/23	Matthew Thompson	Modify privilege log coding panel as required by review team and prepare updates to coding panel layout as requested by M. Herring	0.50
06/21/23	Matthew Thompson	Prepare, QC, and release pre-production saved searches to identify potential document sets, document counts, and review coding for production VOL004 as requested by B. Shrieves	1.70
06/21/23	Matthew Thompson	Continued analysis and development of document identification saved searches as requested by B. Shrieves	2.00
06/21/23	Matthew Thompson	Preparations of workspace fields, views, and searches related to beginning of privilege log coding	0.50
06/21/23	Hitesh Patel	Assist case team with privilege review effort (.3); participate in call with internal team regarding overall production work flow (.5); create document level searches to assist case team (1.0)	1.80



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/21/23	Evan M. Lazerowitz	Review Carnival second set of discovery requests	1.50
06/21/23	John M. Schlenz	Create and edit privilege log entries	6.00
06/21/23	Beth Shrieves	Correspond with DeCurtis re additional discovery requests and documents to be collected	0.30
06/21/23	Beth Shrieves	Review and revise document production set	1.20
06/21/23	Beth Shrieves	Draft responses and objections to Carnival's amended 30(b)(6) notice and second set of requests for production	2.50
06/21/23	Beth Shrieves	Confer with local counsel and Orrick re finalizing protective order	0.40
06/21/23	Beth Shrieves	Research articles and dictionaries re source code and object code	0.50
06/22/23	Michael E. Herring	Quality control review of documents for 06/24 production (7.2); review privilege logging (2.0)	9.20
06/22/23	Cullen D. Speckhart	Multiple calls with client and with advisors	3.20
06/22/23	Cullen D. Speckhart	Extensive negotiations with case parties re financing matters	4.50
06/22/23	Paul J. Springer	Correspondence with B. Shrieves and E. Lazerowitz re response to RFPS and depo notice (.2); review same (.2)	0.40
06/22/23	Matthew Thompson	Pre-Production preparations to identify production document sets, privilege withhold and redact documents and various QC searches related to production set	1.00
06/22/23	Matthew Thompson	Strategy and analysis meeting related to continued progress toward production VOL004, privilege review, redaction review, and privilege log preparations	0.50
06/22/23	Matthew Thompson	Prepare, QC, and release pre-production saved searches to identify potential document sets, document counts, and review coding related to VOL004	2.00
06/22/23	Matthew Thompson	Meeting and analysis of updated production terms and exclusions to finalize identification of production documents	0.80
06/22/23	Hitesh Patel	Assist with document review and production	2.10



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		work flow (.5); participate in call with case team regarding status and pending production volume (.4); review privilege log work flow (1.2)	
06/22/23	John M. Schlenz	Create and edit privilege log entries	5.80
06/22/23	Dustin M. Knight	Log privilege claims as part of document review	2.50
06/22/23	Beth Shrieves	Confer with e-discovery team re document review status	0.50
06/22/23	Beth Shrieves	Review and redact privileged documents within production set	1.50
06/23/23	Michael E. Herring	Quality control review of documents for 06/24 production; privilege logging	7.60
06/23/23	Evan M. Lazerowitz	Meet and confer with Carnival re: discovery	0.50
06/23/23	Evan M. Lazerowitz	Call with B.Shrieves and J.Carino re: document collection	0.40
06/23/23	Hitesh Patel	Participate in call with case team regarding overall production status (.5); participate in internal call regarding production specifications (.4); analyze status of document review and privilege log effort (.5); create document level searches for case team (.6)	2.00
06/23/23	Matthew Thompson	Review status of pre-production saved searches and document identification (1.6); develop strategy for final identification of relevant documents for production volume (.9); Continued review of pre-production coding to ensure consistency in document coding and identification of QC issues (1.1); prepare finalized pre-production document count for release (.4)	4.00
06/23/23	Matthew Thompson	Prepare, QC, and release updated saved searches to identify documents for pre-production QC as requested by B. Shrieves	0.80
06/23/23	John M. Schlenz	Create and edit privilege log entries	6.70
06/23/23	Beth Shrieves	Confer with J. Carino re additional documents to collect	0.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/23/23	Beth Shrieves	Review and finalize production set	7.30
06/23/23	Beth Shrieves	Attend meet and confer with Carnival re discovery requests and document production	0.50
06/24/23	Michael E. Herring	Privilege logging	4.30
06/24/23	Cullen D. Speckhart	Review complaint filed by Carnival	0.80
06/24/23	Cullen D. Speckhart	Review draft opening brief re ownership	0.70
06/24/23	Cullen D. Speckhart	Review emails re documents due to be filed next week	0.30
06/24/23	Hitesh Patel	Assist case team with review and production effort (.6); analyze production volume in preparation for release (.4)	1.00
06/24/23	Matthew Thompson	Production setup to create saved searches for the identifications of potential production documents (.3); prepare saved searches to identify redacted , privileged, native, teach issue, and image docs; provide report of saved searches along with document count for documents identified in potential production searches related to final production volume (.7)	1.00
06/24/23	Matthew Thompson	Production QC related to metadata load file for issue, confidentiality, privilege, and redaction coding as well as native and text counts (1.6); Prepare final QC checklist (.4)	2.00
06/24/23	Evan M. Lazerowitz	Review Carnival adversary complaint	2.10
06/24/23	Beth Shrieves	Review metadata files and final production set for service	2.00
06/25/23	Alexandra Marcus	Call with J. Schlensz regarding privilege log (.5); Review privilege log entries (2.0)	2.50
06/25/23	Michael E. Herring	Review and edit privilege log	3.60
06/25/23	Cullen D. Speckhart	Review draft requests for production received from counsel for Invictus	0.50
06/26/23	Alexandra Marcus	Review privilege log entries	3.00
06/26/23	Michael E. Herring	Privilege logging	7.50
06/26/23	Cullen D. Speckhart	Discuss same with E. Lazerowitz	0.20
06/26/23	Cullen D. Speckhart	Emails re DIP	0.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
06/26/23	Cullen D. Speckhart	Review various documents prepared by GW to be filed this evening	0.80
06/26/23	Michael Aaron Klein	Review emails and briefing re: Carnival dispute	0.50
06/26/23	Hugh B. Stuart	Review documents for privilege (3.2); draft privilege log entries (1.0)	4.20
06/26/23	Hitesh Patel	Review and draft privilege log review and production effort	1.40
06/26/23	John M. Schlenz	Create and edit privilege log entries	8.30
06/26/23	Evan M. Lazerowitz	Review documents ISO production	2.90
06/26/23	Evan M. Lazerowitz	Revise ownership brief re: BK issues	2.50
06/26/23	Beth Shrieves	Begin reviewing privilege log	1.70
06/26/23	Beth Shrieves	Review documents collected from DeCurtis	1.30
06/26/23	Beth Shrieves	Provide production volumes to Proskauer	0.30
06/26/23	Matthew Thompson	Review status of matter requests and analysis related to ongoing matter details, communications, received tasks, and request progress	0.20
06/26/23	Matthew Thompson	Prepare, QC, and release previous production data to Proskauer team in support of discovery	0.80
06/27/23	Alexandra Marcus	Draft and review privilege log entries	4.00
06/27/23	Michael E. Herring	Review privilege log entries	8.40
06/27/23	Hugh B. Stuart	Review documents for privilege (5.2); draft privilege log entries (2.1)	7.30
06/27/23	Hitesh Patel	Assist case team with privilege log review work flow and pending document production	1.20
06/27/23	John M. Schlenz	Create and edit privilege log entries	8.70
06/27/23	Evan M. Lazerowitz	Revise discovery responses to Carnival's second set	1.00
06/27/23	Beth Shrieves	Revise responses and objections to Carnival's discovery requests	1.80
06/27/23	Beth Shrieves	Continue reviewing documents for final production	2.80
06/27/23	Matthew Thompson	Data intake, processing, QC, and release of processed documents via RelOne processing	1.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		module related to loose email collection of DeCurtis emails as requested by B. Shrieves	
06/27/23	Matthew Thompson	Prepare, QC, and release pre-production saved searches to identify potential document sets, document counts, and review coding related to doc review	1.00
06/27/23	Matthew Thompson	Prepare and release updates to privilege log coding panel, fields, and choices as requested by J. Schlentz	0.20
06/28/23	Alexandra Marcus	Assist with privilege log entries	5.00
06/28/23	Michael E. Herring	Review privilege log	7.20
06/28/23	Hugh B. Stuart	Review and draft privilege log entries	6.70
06/28/23	Evan M. Lazerowitz	Call with Proskauer re: document production	0.50
06/28/23	Hitesh Patel	Assist case team with overall review work flow and pending privilege log (.9); confer with internal team regarding document level searches and pending production (.3)	1.20
06/28/23	John M. Schlentz	Create and edit privilege log entries	8.30
06/28/23	Evan M. Lazerowitz	Research ISO credit bidding dispute	2.30
06/28/23	Evan M. Lazerowitz	Review documents re: privilege	2.30
06/28/23	Beth Shrieves	Confer internally re document production	1.00
06/28/23	Beth Shrieves	Finalize and serve DeCurtis' discovery responses and objections	1.00
06/28/23	Beth Shrieves	Continue reviewing final set of documents for production	2.30
06/28/23	Matthew Thompson	Prepare, Qc, and release batches related to privilege log coding as requested by B. Shrieves	0.50
06/28/23	Matthew Thompson	Analysis, preparation, and release of updated instructions related to privilege log	0.80
06/28/23	Matthew Thompson	Prepare, QC, and release pre-production saved searches to identify potential document sets, document counts, and review coding	2.00
06/29/23	Evan M. Lazerowitz	Call with Carnival re: scheduling order	0.50
06/29/23	Michael E. Herring	Review and draft privilege log	6.00
06/29/23	Hitesh Patel	Assist case team with overall document	1.70



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		review effort (1.2); confer with case team and internal team regarding pending production volume and privilege log (.5)	
06/29/23	John M. Schlenz	Edit privilege log entries (2.5); redact privilege material (5.8)	8.30
06/29/23	Evan M. Lazerowitz	Research ISO ownership issues	2.50
06/29/23	Evan M. Lazerowitz	Review documents ISO privilege review	3.30
06/29/23	Michael Aaron Klein	Review emails from all parties regarding all open issues	0.50
06/29/23	Beth Shrieves	Confer internally re document production and privilege log	0.70
06/29/23	Beth Shrieves	Finalize fifth document production set for service	1.20
06/29/23	Beth Shrieves	Continue reviewing final documents for production	1.50
06/29/23	Matthew Thompson	Data intake, processing, QC, and release of processed documents	0.50
06/29/23	Matthew Thompson	Production QC related to metadata load file for issue, confidentiality, privilege, and redaction coding as well as native and text counts	1.00
06/29/23	Matthew Thompson	Perform QC in support of document production	3.80
06/29/23	Matthew Thompson	Data intake, processing, QC, and release of processed documents	0.50
06/29/23	Matthew Thompson	Prepare, QC, and release updated batches related to privilege redaction coding as requested by J. Schlenz	0.60
06/29/23	Matthew Thompson	Meeting related to production and privilege log progress	0.50
06/30/23	Hitesh Patel	Assist case team with document production and privilege log work flow (.6); coordinate privilege log creation with internal team (.3); participate in call with internal team and case team regarding submission of production volume and privilege log (.2); create document level searches for case team (.3)	1.40
06/30/23	John M. Schlenz	Edit privilege log entries (4.2); redact privileged materials (1.5); format privilege log	8.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		(2.3)	
06/30/23	Evan M. Lazerowitz	Review documents ISO privilege review	3.00
06/30/23	Evan M. Lazerowitz	Research ISO credit bid challenge opposition	4.50
06/30/23	Beth Shrieves	Finalize last production set and privilege log for service	5.40
06/30/23	Matthew Thompson	Meeting related to pre-production document coding, QC, and status updates	0.50
06/30/23	Matthew Thompson	Final preparation of VOL006 production for QC and release of production and privilege log	1.00
06/30/23	Matthew Thompson	Continued analysis and strategy meetings and development of searches, keywords, exclusion sets, and tagging to define production set	3.00
Task Total:			688.40 383,143.60

MEETINGS

06/02/23	Evan M. Lazerowitz	Update call with board	2.00
06/09/23	Michael Aaron Klein	Attend Board meeting	1.10
06/09/23	Evan M. Lazerowitz	Update call with board	1.30
06/15/23	Evan M. Lazerowitz	Call with board re: case status	1.00
06/16/23	Cullen D. Speckhart	Call with John Ashmead in support of case update	0.50
06/21/23	Evan M. Lazerowitz	Emergency board meeting re: financing	2.30
06/22/23	Evan M. Lazerowitz	Call with Proskauer re: status conference	0.20
06/28/23	Evan M. Lazerowitz	Call with Invictus and H.Murtagh	0.50
06/29/23	Evan M. Lazerowitz	Call with H.Murtagh and Proskauer	0.50
Task Total:			9.40 11,940.50

RELIEF FROM STAY PROCEEDINGS

06/01/23	Evan M. Lazerowitz	Finalize lift-stay opposition	3.50
06/05/23	Samuel R. Rabuck	Analyze Carnival's reply in support of the stay	5.30



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
		relief motion (.6); draft chart outlining arguments (4.7)		
06/05/23	Paul J. Springer	Analyze Carnival's reply iso of lift stay motion	0.50	
06/05/23	Evan M. Lazerowitz	Review and analyze Carnival reply ISO stay relief	2.70	
06/06/23	Evan M. Lazerowitz	Extensive preparation for stay relief oral argument and witness preparation	5.30	
06/07/23	Evan M. Lazerowitz	Argue stay relief and other motions	3.50	
Task Total:			20.80	24,491.00

LEASES AND EXECUTORY CONTRACTS

06/06/23	Paul J. Springer	Analyze indemnification obligations in material contract (.4); correspondence with Company and E. Lazerowitz re same (.3); confer with J. Carino re same (.5)	1.20
06/14/23	Evan M. Lazerowitz	Draft license rejection motion	1.20
06/14/23	Evan M. Lazerowitz	Research re: 365(n)	2.00
06/15/23	Evan M. Lazerowitz	Draft motion to reject Carnival license agreement	1.50
06/16/23	Paul J. Springer	Confer with Disney counsel and Company re extension of contract (.8); review motion to reject Carnival MSA (.2)	1.00
06/17/23	Paul J. Springer	Correspondence with Cooley and Company teams re Carnival rejection motion	0.20
06/18/23	Paul J. Springer	Correspondence with Company and Cooley teams re rejection of Carnival MSA	0.40
06/18/23	Evan M. Lazerowitz	Call with Carnival re: rejection motion	0.40
06/18/23	Evan M. Lazerowitz	Draft response to Carnival re: rejection	1.60
06/19/23	Paul J. Springer	Analyze Carnival's objection to MSA rejection motion (.3); correspondence with Cooley, Company, Potter, and Province teams re same (.3); review draft emergency motion i/c/w reply for same (.5); review Atkinson declaration i/c/w same (.3); further correspondence with Company and E. Lazerowitz re foregoing (.2); correspondence	1.70



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Bankruptcy**

Invoice Number: 2704228

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
		with Proskauer re foregoing (.1)		
06/19/23	Amanda L. Lindner	Proof emergency reply motion to reject Carnival contracts (1.4); correspond with internal team re same (.4)	1.80	
06/19/23	Samuel R. Rabuck	Revise combined objection, reply, and MSA rejection pleading	2.40	
06/19/23	Evan M. Lazerowitz	Draft Atkinson declaration ISO rejection	1.20	
06/19/23	Evan M. Lazerowitz	Draft opposition to Carnival's emergency motion to compel	6.30	
06/20/23	Paul J. Springer	Review finalized objection/reply i/c/w motion to reject Carnival MSA (.3); correspondence with Company and E. Lazerowitz re Carnival demands i/c/w same (.2)	0.50	
06/21/23	Paul J. Springer	Correspondence with Company and E. Lazerowitz re strategy on Carnival MSA rejection motion	0.20	
06/21/23	Evan M. Lazerowitz	Research ISO hearing on rejection motion	3.60	
06/22/23	Evan M. Lazerowitz	Call with Carnival re: rejection issues	0.50	
06/22/23	Evan M. Lazerowitz	Draft DIP-related letter agreement	2.30	
06/23/23	Robert L. Eisenbach	Analyze issues re Carnival rejection and IP issues	0.50	
06/23/23	Evan M. Lazerowitz	Call with B.Eisenbach re: 365(n) issues	0.50	
Task Total:			31.00	36,960.00

PREPARATION FOR AND ATTENDANCE AT COURT HEARINGS

06/01/23	Amanda L. Lindner	Correspond with Potter and E. Lazerowitz re supplemental declaration (.4); draft supplemental declaration (1.2); correspond with E. Lazerowitz re supplemental declaration revisions (.3); correspond with C. Speckhart re same (.1)	2.00
06/06/23	Michael Aaron Klein	Confer with team and review materials re: lift stay and bid procedures hearing	1.20
06/06/23	Samuel R. Rabuck	Draft table summarizing arguments set forth in the pleadings related to the bidding procedures motion (3.0); telephone conference with Carnival counsel re: hearing	3.30



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Bankruptcy

Invoice Number: 2704228

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		items, witness coordination for 6/7 hearing (.3)	
06/06/23	Cullen D. Speckhart	Prepare for hearing on Carnival MFR	3.10
06/07/23	Amanda L. Lindner	Telephonically attend 6/7 omnibus hearing	2.80
06/07/23	Paul J. Springer	Virtually attend omnibus hearing (partial)	3.00
06/07/23	Denise Cahir	Attend hearing conducted in multiple parts, including AM session (1.8) and PM session (1.8)	3.60
06/07/23	Cullen D. Speckhart	Participate in hearing on Carnival motion for relief, follow up with litigation team and clients re various legal issues to be addressed in connection with outstanding carnival disputes	7.50
06/15/23	Cullen D. Speckhart	Attend court hearing on MFR, analyze next steps in bidding process, discuss same with E. Lazerowitz	2.20
06/15/23	Paul J. Springer	Attend status conference on lift stay ruling and bid pro scheduling (.7); review follow up correspondence from Orrick re same (.1)	0.80
06/15/23	Amanda L. Lindner	Telephonically attend 6/15 status conference	0.70
06/15/23	Evan M. Lazerowitz	Attend status conference	1.00
06/15/23	Denise Cahir	Attend status conference	0.70
06/21/23	Cullen D. Speckhart	Prepare for and participate in court hearings	1.20
06/21/23	Paul J. Springer	Attend status conference on scheduling, bid pro, and rejection matters (partial)	1.00
06/21/23	Evan M. Lazerowitz	Attend status conference	1.10
06/21/23	Denise Cahir	Attend AM session (1.4) and PM session (0.5) of status conference	1.90
06/22/23	Amanda L. Lindner	Telephonically attend 6/22 morning and afternoon hearings (partial attendance)	0.80
06/22/23	Cullen D. Speckhart	Prepare for and appear at court hearings	2.50
06/22/23	Evan M. Lazerowitz	Continued status conferences	1.20
06/22/23	Paul J. Springer	Attend status conference on DIP	0.50
06/22/23	Denise Cahir	Attend AM session (0.3) and PM session (0.4) of status conference	0.70
06/23/23	Cullen D. Speckhart	Review emails re Virgin agreement	0.40



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Invoice Number: 2704228

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
		Task Total:	43.20	49,406.00
INTELLECTUAL PROPERTY				
06/06/23	Kimberly P. Nguyen	Prepare intercompany IP addendum	1.30	
06/12/23	Kimberly P. Nguyen	Review source code agreement	0.60	
06/13/23	Kimberly P. Nguyen	Review source code agreements for Disney	0.30	
		Task Total:	2.20	2,772.00
Total Fees				\$660,218.60



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Invoice Number: 2704228

Fee Summary:

<u>Timekeeper</u>	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Stephen R. Smith	Partner	1595	15.20	24,244.00
Aaron D. Binstock	Partner	1335	.60	801.00
Cullen D. Speckhart	Partner	1600	68.60	109,760.00
Michael Aaron Klein	Partner	1335	22.30	29,770.50
Robert L. Eisenbach	Of Counsel	1560	.50	780.00
Kimberly P. Nguyen	Special Counsel	1260	2.20	2,772.00
Jacquelyn M. Burke	Special Counsel	1290	1.10	1,419.00
Bryan Y. Liu	Associate	1250	.40	500.00
Leo J. Spicer-Phelps	Associate	1245	.90	1,120.50
Evan M. Lazerowitz	Associate	1240	151.00	187,240.00
Dustin M. Knight	Associate	1205	18.40	22,172.00
Beth Shrieves	Associate	1080	72.80	78,624.00
Cristina L. DeBiase	Associate	1080	4.80	5,184.00
Meredith R. Klionsky	Associate	1250	1.60	2,000.00
Paul J. Springer	Associate	1235	24.50	30,257.50
Xueqing Li	Associate	890	2.50	2,225.00
Marquavious A. Strozier	Associate	780	15.50	12,090.00
Nicholas R. Perez	Associate	780	1.40	1,092.00
Amanda L. Lindner	Associate	670	29.60	19,832.00
Samuel R. Rabuck	Associate	995	11.00	10,945.00
Michael E. Herring	Associate	355	81.40	28,897.00
John M. Schlenz	Associate	355	78.10	27,725.50
Hugh B. Stuart	Associate	355	18.20	6,461.00
Alexandra Marcus	Associate	355	14.50	5,147.50
Jee-Hyeon J. Kim	Other Timekeepers	54	21.00	1,134.00
Robert D. Breen	Other Timekeepers	54	27.50	1,485.00
Brittany A. Sterling	Other Timekeepers	54	22.00	1,188.00
Yvonne G. Carlile	Other Timekeepers	54	27.60	1,490.40
Lisa P. Dennis	Other Timekeepers	54	14.20	766.80
Sarah G. Garris	Other Timekeepers	54	20.00	1,080.00
Todd W. Hutton	Other Timekeepers	54	29.00	1,566.00
Alejandrina M. Luna	Other Timekeepers	54	18.40	993.60
Christian L. Ornelas	Other Timekeepers	54	16.20	874.80
Johann T. Toucet	Other Timekeepers	54	11.50	621.00
Mollie N. Canby	Paralegal	415	.10	41.50
Denise Cahir	Paralegal	380	14.20	5,396.00
Matthew Thompson	Lit/E-Discovery Svcs.	420	43.30	18,186.00
Hitesh Patel	E-Discovery Staff Attorney	560	25.60	14,336.00

For costs and disbursements recorded through June 30, 2023 :



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Bankruptcy

Invoice Number: 2704228

Hotels and Meals (Hotels)	350.00
Wilmington, DE - Quoin Hotel for DeCurtis Bankruptcy Court	
06/06/2023-06/07/2023	
Cullen D. Speckhart	
Meals	18.00
Research Database / Document Retrieval	1,613.09
Train Fare	194.00
1 Client Billable // Expedia #211131526636 // 5/26 Hearing // Traveler: Lazerowitz/Evan // Train	
Train Fare	304.00
Traveler: Lazerowitz/Evan // Train	
Train Fare	70.00
Traveler: Speckhart/Cullen // Train - 211179142488	
Transportation	69.38
Total Costs	\$2,618.47
Total:	\$662,837.07



August 17, 2023

Joe Carino
DeCurtis Holdings LLC
3208 East Colonial Drive
Suite C190
Orlando, FL 32803

ATTORNEYS AT LAW

3 Embarcadero Center
20th Floor
San Francisco, CA
94111-4004
MAIN 415 693-2000
FAX 415 693-2222

www.cooley.com

Taxpayer ID Number
94-1140085

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Los Angeles, CA
Santa Monica, CA
Denver, CO
Seattle, WA
New York, NY
Reston, VA
Washington, DC
Boston, MA
Chicago, IL
Shanghai, P. R. China
Beijing, P. R. China
Hong Kong
Singapore
London, United Kingdom
Brussels, Belgium

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Bankruptcy

Invoice Number: 2704228

REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For services rendered-Invoice No. 2704228:

Fees	\$	660,218.60
Chargeable costs and disbursements	\$	2,618.47
Total Due on Current Invoice (USD)	\$	662,837.07

Outstanding Balance from prior Invoices as of 8/17/2023 *(May not reflect recent payments)*

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Balance</u>	<u>Late Charges</u>	<u>Balance Due</u>
2677631	6/30/2023	150,087.70	0.00	150,087.70
2704477	8/17/2023	557,317.73	0.00	557,317.73

Total Outstanding Balance from prior Invoices (Disregard if paid) **\$ 707,405.43**



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Invoice Number: 2704228

Total Amount Due on Current and Prior Invoices (USD) \$ 1,370,242.50

Cooley LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004

Tax ID# 94-1140085

Invoices are due and payable upon receipt. Any unpaid balance after 30 days may
accrue late charges.

Payment may be made by wire transfer or ACH:
Wells Fargo Bank - San Francisco, CA 94104
Account # 4129155206 ABA Routing # 121000248 Swift # WFBIUS6S
**When making electronic payments please provide invoice number(s)
and send remittance advice to AR@cooley.com**

View balances and pay open invoices via Cooley's payment portal:
ww2.e-billexpress.com/ebpp/CooleyLLP

To protect against wire fraud attacks, wiring instructions will not be changed during this transaction.
If you receive updated wire transfer instructions that do not agree to the information on this invoice,
please contact a member of Accounting-Accounts Receivable.
Cooley's public website includes firm office phone numbers.



August 17, 2023

Joe Carino
DeCurtis Holdings LLC
3208 East Colonial Drive
Suite C190
Orlando, FL 32803

ATTORNEYS AT LAW

3 Embarcadero Center
20th Floor
San Francisco, CA
94111-4004
MAIN 415 693-2000
FAX 415 693-2222

www.cooley.com

Taxpayer ID Number
94-1140085

Palo Alto, CA
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Washington, DC
Boston, MA
Chicago, IL
Shanghai, P. R. China
Beijing, P. R. China
Hong Kong
Singapore
London, United Kingdom
Brussels, Belgium

Invoice Number: 2704477

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Bankruptcy

For services rendered through July 31, 2023

Fees	\$	550,573.00
Chargeable costs and disbursements	\$	6,744.73
Total Due on Current Invoice (USD)	\$	557,317.73

To protect against wire fraud attacks, wiring instructions will not be changed during this transaction.
If you receive updated wire transfer instructions that do not agree to the information on this invoice,
please contact a member of Accounting-Accounts Receivable.
Cooley's public website includes firm office phone numbers.



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Bankruptcy

Invoice Number: 2704477

For services rendered through July 31, 2023 :

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
ASSET DISPOSITION				
07/06/23	Amanda L. Lindner	Review and revise sale motion (1.4); correspond with E. Lazerowitz re same (.2)	1.60	
07/07/23	Evan M. Lazerowitz	Call with M.Trentin re: bidding procedures	0.30	
07/07/23	Evan M. Lazerowitz	Call with Atkinson and Crockett re: credit bidding	0.50	
07/12/23	Paul J. Springer	Review Invictus objection and related declaration i/c/w standing and credit bidding	0.50	
07/20/23	Paul J. Springer	Review proposed revised bid pro order	0.10	
07/21/23	Evan M. Lazerowitz	Revise bidding procedures order	0.50	
07/28/23	Denise Cahir	Cite-check findings of fact and conclusions of law and insert to post-trial brief (2.6); communications with B. Shrieves re same (0.1)	2.70	
07/31/23	Evan M. Lazerowitz	Revise bidding procedures order (1.6); revise sale-related documents and cure schedule (1.1)	2.70	
07/31/23	Evan M. Lazerowitz	Call with J.Sazant re: sale	0.60	
Task Total:			9.50	8,543.00
BUSINESS OPERATIONS				
07/12/23	Evan M. Lazerowitz	Call with H.Murtagh re: Virgin issues	0.30	
Task Total:			0.30	372.00
CASE ADMINISTRATION				
07/05/23	Michael Aaron Klein	Confer with EL re: updates	0.40	
07/05/23	Paul J. Springer	Correspondence with D. Cahir re case calendar	0.10	
07/05/23	Denise Cahir	Update calendar and critical dates memo re upcoming depositions and related deadlines	0.40	
07/05/23	Denise Cahir	Organize voluminous exhibits to sealed Uriarte Declaration and circulate same	0.20	



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/05/23	Denise Cahir	Calendar deadlines per scheduling order	0.20
07/10/23	Denise Cahir	Review Carnival's motion to limit Invictus's right to credit bid and calendar related objection deadline	0.10
07/10/23	Denise Cahir	Review Carnival's seal and standing motions and calendar relevant objection deadlines (0.1); update critical dates memo (0.1)	0.20
07/10/23	Denise Cahir	Update critical dates memo	0.30
07/10/23	Denise Cahir	Calendar upcoming depositions	0.10
07/11/23	Cullen D. Speckhart	Receipt and review of various discovery materials relating to ownership disputes	1.30
07/11/23	Cullen D. Speckhart	Review various emails relating to trial process, evidentiary presentation and witness prep	0.50
07/11/23	Cullen D. Speckhart	Call with D. Decurtis and E. Lazerowitz	0.80
07/13/23	Paul J. Springer	Correspondence with D. Cahir re scheduling matters	0.10
07/13/23	Denise Cahir	Circulate Carino deposition exhibits to team	0.20
07/13/23	Denise Cahir	Update calendar and critical dates memo re numerous changes to deposition schedule	0.40
07/13/23	Denise Cahir	Calendar Padgett deposition	0.10
07/13/23	Denise Cahir	Circulate transcript of Carino deposition	0.10
07/13/23	Denise Cahir	Communications with L. Huber (Potter) re registrations for July 17, 2023 pretrial conference	0.10
07/14/23	Denise Cahir	Communications with E. Lazerowitz and B. Shrieves re deposition logistics	0.20
07/14/23	Denise Cahir	Update deposition calendar entries with attendance details	0.20
07/14/23	Denise Cahir	Communications with C. Wu (Groombridge) re request for sealed filings	0.30
07/14/23	Denise Cahir	Communications with B. Shrieves re sealed filings (0.1); follow-up communications with L. Huber (Potter) and K. McCloskey (Potter) re same (0.2)	0.30
07/16/23	Denise Cahir	Update calendar re details of Atkinson and Learish depositions (0.1); communications	0.20



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
		with E. Lazerowitz re same (0.1)		
07/17/23	Denise Cahir	Circulate transcript of Atkinson deposition	0.10	
07/17/23	Denise Cahir	Update calendar re rescheduled pretrial conference on July 17, 2023	0.10	
07/17/23	Denise Cahir	Communications with Orrick firm re attendance details for Learish deposition (0.1); follow up with E. Lazerowitz and others re same (0.1)	0.20	
07/18/23	Denise Cahir	Communications with E. Lazerowitz re Cooley W-9	0.10	
07/19/23	Denise Cahir	Calendar Saxena deposition	0.10	
07/19/23	Denise Cahir	Circulate sealed Saxena Declaration	0.10	
07/21/23	Denise Cahir	Calendar deadline to file post-trial brief	0.10	
07/21/23	Denise Cahir	Calendar objection deadline re Landis Rath & Cobb DIP fees	0.10	
07/27/23	Denise Cahir	Communications with Veritext re request for final Carino transcript	0.20	
07/28/23	Denise Cahir	Communications with E. Lazerowitz and A. Lindner re June monthly fee application	0.10	
Task Total:			8.00	6,765.00

CLAIMS

07/05/23	Stephen R. Smith	Strategy discussions regarding trial with internal team (.5); prepare for upcoming trial (2.0)	2.50
07/06/23	Stephen R. Smith	Trial preparation	1.80
07/10/23	Samuel R. Rabuck	Analyze, revise debtor's objection to Carnival's standing motion	0.50
07/11/23	Samuel R. Rabuck	Analyze, revise debtors' objection to Carnival's standing, credit bid motions (1.7); analyze, revise Carino declaration in support of same (.4); analyze revise Atkinson declaration in support of same (.3)	2.40
07/12/23	Stephen R. Smith	Prepare for and participate in witness preparation for trial	2.00
07/18/23	Stephen R. Smith	Prepare for trial (1.5); prepare for and	2.90



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Invoice Number: 2704477

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
		participate in witness preparation (1.4)		
07/21/23	Stephen R. Smith	Follow up on post trial issues	1.30	
07/26/23	Stephen R. Smith	Review and analyze post hearing brief	1.20	
Task Total:			14.60	21,547.00

FEE/EMPLOYMENT APPLICATIONS

07/03/23	Paul J. Springer	Correspondence with A. Lindner and Potter re first monthly fee statement	0.20	
07/06/23	Paul J. Springer	Review revised scheduling order	0.10	
07/26/23	Amanda L. Lindner	Review correspondence with internal team and client re fees and budget	0.20	
Task Total:			0.50	504.50

COOLEY FEE APPLICATION

07/03/23	Amanda L. Lindner	Review fee application (.2); correspond with internal team in support of filing (.1); correspond with potter team re same (.1)	0.40	
Task Total:			0.40	268.00

FINANCING AND CASH COLLATERAL

07/05/23	Evan M. Lazerowitz	Review updated budget	0.40	
07/17/23	Xueqing Li	Review borrowing notice and coordination of same with internal team	0.30	
07/18/23	Paul J. Springer	Review DIP borrowing notice (.1); correspondence with Proskauer and X. Li re same (.1)	0.20	
07/21/23	Paul J. Springer	Correspondence with X. Li and Proskauer re DIP borrowing	0.10	
07/21/23	Xueqing Li	Prepare borrowing notice and coordination of same with internal team	0.50	
07/27/23	Evan M. Lazerowitz	Call with B.Finestone re: case status	0.20	
Task Total:			1.70	1,826.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
LITIGATION			
07/02/23	Beth Shrieves	Begin reviewing documents in preparation for upcoming depositions	2.00
07/03/23	Beth Shrieves	Confer internally re meet and confer with Carnival	0.50
07/03/23	Beth Shrieves	Attend meet and confer with Carnival	0.50
07/03/23	Evan M. Lazerowitz	Call with Wertheim, Roche, and B.Shrieves re: discovery issues	0.40
07/03/23	Evan M. Lazerowitz	Review documents ISO trial preparation	3.50
07/03/23	Beth Shrieves	Review documents in preparation of upcoming depositions	4.20
07/04/23	Michael Aaron Klein	Emails re: status of depositions and discovery	0.30
07/04/23	Beth Shrieves	Correspond internally re upcoming depositions and 30(b)(6) topics	0.40
07/04/23	Beth Shrieves	Continue reviewing documents for use in deposition	2.00
07/05/23	Matthew Thompson	Prepare, QC, and release PDF documents related to previously produced documents as requested by B. Shrieves	0.50
07/05/23	Evan M. Lazerowitz	Call with J.Sazant re: trial	0.50
07/05/23	Evan M. Lazerowitz	Call with Speckhart, Smith, and Shrieves re: trial preparation	0.50
07/05/23	Evan M. Lazerowitz	Review documents ISO trial	2.50
07/05/23	Evan M. Lazerowitz	Review Carnival's standing motion	3.10
07/05/23	Beth Shrieves	Confer internally re deposition and trial preparations	0.90
07/06/23	Michael Aaron Klein	Review Carnival pleadings	3.70
07/06/23	Evan M. Lazerowitz	Research ISO opposition to standing motion	4.20
07/06/23	Evan M. Lazerowitz	Review Carnival's voluminous filings re ownership and standing	5.40
07/06/23	Beth Shrieves	Correspond with A. Pennfield re deposition topics	0.30
07/06/23	Beth Shrieves	Confer with Groombridge Wu re upcoming brief strategy	1.00



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Invoice Number: 2704477

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/06/23	Marquavious A. Strozier	Correspondence re proceedings with internal team	0.20
07/07/23	Paul J. Springer	Review correspondence from Groombridge re briefing	0.10
07/07/23	Evan M. Lazerowitz	Calls with GWBS re: trial preparation	1.60
07/07/23	Evan M. Lazerowitz	Extensive research ISO opposition to standing motion (3.2); draft opposition to same (4.4)	7.60
07/07/23	Stephen R. Smith	Review and analyze Carnival complaint (.6); analysis and discussions regarding motion to dismiss (1.3)	1.90
07/07/23	Beth Shrieves	Confer with J. Carino re deposition	0.50
07/07/23	Beth Shrieves	Confer with DeCurtis and Groombridge Wu re ownership and adversary brief	1.00
07/07/23	Beth Shrieves	Attend meet and confer with Carnival	0.50
07/07/23	Beth Shrieves	Confer with Groombridge Wu re brief strategy	0.50
07/07/23	Beth Shrieves	Research and draft motion to dismiss Complaint	6.90
07/07/23	Marquavious A. Strozier	Draft court notices and filings (5; correspondence re same with internal team (.3)	0.80
07/08/23	Paul J. Springer	Review Carnival motion to deny credit bid (.5), standing motion and complaint (.7), and sale-related brief (.8)	2.00
07/08/23	Beth Shrieves	Review production documents for use in opposition brief	0.50
07/08/23	Beth Shrieves	Revise motion to dismiss adversary complaint	2.10
07/08/23	Beth Shrieves	Begin drafting answer to complaint	3.60
07/09/23	Michael Aaron Klein	Review and comment on draft reply brief to standing motion (2.1); numerous confers with team re: same (2.4)	4.50
07/09/23	Paul J. Springer	Review draft objection and related declaration i/c/w standing motion (.6); correspondence with internal team re same (.2); confer with E. Lazerowitz re same (.5)	1.30
07/09/23	Stephen R. Smith	Discussions and revisions to draft answer	1.00



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Invoice Number: 2704477

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/09/23	Beth Shrieves	Continue drafting answer to adversary complaint	0.50
07/09/23	Beth Shrieves	Revise answer to adversary complaint	1.60
07/10/23	Michael Aaron Klein	Deposition and trial prep	0.70
07/10/23	Michael Aaron Klein	Meet and confer with Orrick	0.40
07/10/23	Matthew Thompson	Data intake, processing, QC, and release of processed documents	1.30
07/10/23	Paul J. Springer	Review Province comments to objection to standing motion (.2); comment on Carino declaration (.4); correspondence with J. Carino re depo prep (.1); correspondence with internal team and Proskauer re document productions (.2)	0.90
07/10/23	Evan M. Lazerowitz	Call with Proskauer re: litigation strategy	0.50
07/10/23	Evan M. Lazerowitz	Discovery call with Invictus and Carnival	0.70
07/10/23	Evan M. Lazerowitz	Draft declarations ISO opposition to standing motion	4.80
07/10/23	Stephen R. Smith	Review declarations (1.3); prepare for trial (.6)	1.90
07/10/23	Beth Shrieves	Review email documents and attachments for production	2.00
07/10/23	Beth Shrieves	Further revise draft answer to adversary complaint	1.20
07/10/23	Marquavious A. Strozier	Draft court filing and notice and correspondence re same with internal team	0.40
07/11/23	Matthew Thompson	Prepare metadata field map, create Relativity load profile, load documents, QC loaded documents	1.50
07/11/23	Matthew Thompson	Export production PDF documents as requested by B. Shrieves	0.30
07/11/23	Michael Aaron Klein	Review draft brief in ownership dispute	1.40
07/11/23	Paul J. Springer	Research i/c/w standing motion response	0.40
07/11/23	Evan M. Lazerowitz	Call with GWBS, Potter, and Cooley litigation teams re: post-trial briefing	0.40
07/11/23	Evan M. Lazerowitz	Revise and update declarations ISO standing objection and the objection	7.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/11/23	Stephen R. Smith	Preparation for witness preps	1.20
07/11/23	Beth Shrieves	Correspond with Carnival re Carnival's production of documents	0.20
07/11/23	Beth Shrieves	Produce additional documents	0.20
07/11/23	Beth Shrieves	Confer with Groombridge Wu re post-hearing briefs	0.50
07/11/23	Beth Shrieves	Organize exhibits to opposition brief	2.70
07/11/23	Denise Cahir	Cite check objection to standing motion	2.20
07/12/23	Michael Aaron Klein	Calls and emails and review materials re: deposition and trial prep	1.80
07/12/23	Cullen D. Speckhart	Discuss litigation strategy with Michael Klein and prepare for depositions by reviewing notices and materials	2.20
07/12/23	Paul J. Springer	Depo prep with J. Carino (2.0); review final objection to Carnival standing motion (.3)	2.30
07/12/23	Evan M. Lazerowitz	Call with Carino re: trial preparation	2.00
07/12/23	Evan M. Lazerowitz	Finalize credit bidding opposition brief	4.20
07/12/23	Evan M. Lazerowitz	Revise ownership brief	3.50
07/12/23	Beth Shrieves	Finalize answer for filing	1.00
07/12/23	Beth Shrieves	Finalize opposition brief and exhibits for filing	1.10
07/12/23	Beth Shrieves	Prepare for deposition of J. Carino	3.00
07/12/23	Denise Cahir	Update calendar re Carino deposition details	0.10
07/13/23	Amanda L. Lindner	Correspond with E. Lazerowitz in support of Padgett deposition	0.30
07/13/23	Michael Aaron Klein	Attend Carino deposition and post-depo meeting	3.40
07/13/23	Evan M. Lazerowitz	Attend trial preparation meetings with GWBS and Fournier	1.20
07/13/23	Evan M. Lazerowitz	Defend Carino deposition	3.10
07/13/23	Evan M. Lazerowitz	Research ISO ownership reply brief	4.50
07/13/23	Stephen R. Smith	Prepare for hearing	1.50
07/13/23	Beth Shrieves	Confer with external team re trial logistics	0.50
07/13/23	Beth Shrieves	Finish preparing for J. Carino deposition	1.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/14/23	Amanda L. Lindner	Attend Padgett deposition (1.2); correspond with E. Lazerowits in support of same (.2)	1.40
07/14/23	Matthew Thompson	Analysis and release of production bates information	0.30
07/14/23	Michael Aaron Klein	Attend Delano deposition	3.60
07/14/23	Evan M. Lazerowitz	Attend Chen Delano deposition	8.00
07/14/23	Hitesh Patel	Assist case team with document production preparation (.5); participate in call with internal team (.8)	1.30
07/14/23	Stephen R. Smith	Prepare for and participate in trial preparation meeting	1.60
07/14/23	Beth Shrieves	Prepare overlay files	0.40
07/14/23	Beth Shrieves	Attend meet and confer with Carnival re pre-trial order	0.50
07/14/23	Beth Shrieves	Correspond internally re trial preparations	0.50
07/14/23	Beth Shrieves	Attend deposition of D. Fournier	5.10
07/14/23	Beth Shrieves	Review and organize trial materials	1.60
07/14/23	Arthur C. Daye	Process documents and prepare the same for production (.7); finalize production and prepare the same for transmission to counsel (.3)	1.00
07/15/23	Evan M. Lazerowitz	Trial preparation call with GWBS	1.30
07/15/23	Beth Shrieves	Confer with Groombridge Wu re trial preparations	1.00
07/15/23	Beth Shrieves	Continue organizing materials and preparing for trial	3.50
07/16/23	Beth Shrieves	Confer with Groombridge Wu re trial preparations	1.00
07/16/23	Beth Shrieves	Assist in finalizing exhibit and witness list	0.60
07/16/23	Beth Shrieves	Prepare for deposition of M. Atkinson	3.50
07/17/23	Matthew Thompson	Prepare, QC, and release analysis and saved search of received exhibit list for pre-trial review of documents	1.00
07/17/23	Matthew Thompson	Pre-production preparations related to claw back and downgrade documents	0.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/17/23	Amanda L. Lindner	Attend Atkinson deposition (.3); attend De La Inglesia deposition (1.9); attend status conference (.7)	2.90
07/17/23	Michael Aaron Klein	Attend Learish depo	1.00
07/17/23	Michael Aaron Klein	Confer with team re: deposition summaries and trial prep	1.70
07/17/23	Paul J. Springer	Review Carnival reply i/c/w sale motion (.4); review Carnival reply i/c/w credit bid challenge (.4); review proposed pretrial order (.5)	1.30
07/17/23	Evan M. Lazerowitz	Defend Atkinson deposition	2.10
07/17/23	Evan M. Lazerowitz	Prepare exhibit list for credit bidding portion of trial	1.50
07/17/23	Stephen R. Smith	Trial preparation	1.40
07/17/23	Beth Shrieves	Attend pretrial meet and confer with Carnival	0.70
07/17/23	Beth Shrieves	Summarize depositions of Messrs. Padgett and Fournier	1.70
07/17/23	Beth Shrieves	Attend pre-trial conference	1.00
07/17/23	Denise Cahir	Download and organize Carnival's trial exhibits	0.50
07/17/23	Beth Shrieves	Correspond with opposing counsel re objections to demonstratives	0.50
07/17/23	Beth Shrieves	Review exhibits from Carnival's exhibit list for potential objections	3.00
07/17/23	Beth Shrieves	Begin preparing direct exam outlines for trial	2.50
07/17/23	Beth Shrieves	Prepare redactions of opposition brief filings	2.00
07/18/23	Amanda L. Lindner	Attend trial (partial)	0.50
07/18/23	Beth Shrieves	Prepare direct and rebuttal exam outlines	6.20
07/18/23	Beth Shrieves	Prepare for J. Carino's direct testimony	2.00
07/18/23	Beth Shrieves	Prepare for trial	2.00
07/19/23	Michael Aaron Klein	Attend Day 2 of trial	6.70
07/19/23	Amanda L. Lindner	Telephonically attend trial (partial)	1.90
07/19/23	Stephen R. Smith	Prepare for and participate in trial	6.10
07/19/23	Beth Shrieves	Prepare exhibits and witnesses for trial	2.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/19/23	Beth Shrieves	Attend trial	4.00
07/20/23	Michael Aaron Klein	Attend Day 3 of trial	4.50
07/20/23	Evan M. Lazerowitz	Review Carnival's proposed exhibits ISO cross-examination defense	2.00
07/20/23	Stephen R. Smith	Prepare for and participate in trial	5.50
07/20/23	Beth Shrieves	Attend trial	5.60
07/21/23	Evan M. Lazerowitz	Review transcripts ISO post-trial briefing	4.20
07/21/23	Beth Shrieves	Begin preparing for post-trial brief	1.50
07/23/23	Beth Shrieves	Begin preparing for post-trial brief	0.70
07/24/23	Michael Aaron Klein	Call with team re: post-trial briefing	0.50
07/24/23	Amanda L. Lindner	Correspond with internal team litigation current status and next steps	0.40
07/24/23	Evan M. Lazerowitz	Call with GWBS and Cooley litigation teams re: post-trial briefing	0.60
07/24/23	Evan M. Lazerowitz	Prepare inserts for post-trial briefing re: credit bidding and standing	3.60
07/24/23	Stephen R. Smith	Follow up on post trial brief discussions	0.90
07/24/23	Beth Shrieves	Confer with external team re post-trial brief	1.00
07/25/23	Amanda L. Lindner	Correspond with internal team litigation current status and next steps	0.20
07/25/23	Evan M. Lazerowitz	Revise inserts for post-trial briefing re: credit bidding and standing	3.00
07/25/23	Beth Shrieves	Confer internally re post-trial brief	0.30
07/26/23	Evan M. Lazerowitz	Revise post-trial brief re: credit bidding	5.60
07/26/23	Beth Shrieves	Draft post-trial briefing	8.10
07/27/23	Evan M. Lazerowitz	Revise proposed findings of fact and conclusions of law	4.30
07/27/23	Stephen R. Smith	Review post hearing brief	0.90
07/27/23	Beth Shrieves	Attend meet and confer with Carnival re admitted exhibits	0.50
07/27/23	Beth Shrieves	Revise post-trial briefing	5.40
07/28/23	Evan M. Lazerowitz	Extensive revisions to post-trial briefs	4.50



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/28/23	Paul J. Springer	Review Invictus post-trial brief	0.30
07/28/23	Stephen R. Smith	Discussions and analysis re brief	0.60
07/28/23	Beth Shrieves	Finalize post-trial brief filings	3.20
07/28/23	Beth Shrieves	Finalize proposed facts and conclusions of law	2.20
Task Total:			307.60 361,931.50

MEETINGS

07/05/23	Amanda L. Lindner	Telephonically attend 341 meeting and correspond with E. Lazerowitz re same	0.80
07/11/23	Evan M. Lazerowitz	Call with D.DeCurtis re: case update for board	0.50
07/28/23	Evan M. Lazerowitz	Weekly call with Disney	0.50
Task Total:			1.80 1,776.00

CORPORATE FINANCE

07/12/23	Timothy Nguyen	Correspondence with E. Lazerowitz and J. Carino re credit agreement terms	0.50
Task Total:			0.50 617.50

LEASES AND EXECUTORY CONTRACTS

07/13/23	Marquavious A. Strozier	Review and revise contract cure schedule	1.30
Task Total:			1.30 1,014.00

PREPARATION FOR AND ATTENDANCE AT COURT HEARINGS

07/02/23	Cullen D. Speckhart	Review litigation and financing matters	2.60
07/05/23	Cullen D. Speckhart	Multiple emails and discussions with internal team and clients re: trial process, depositions, open issues and allocation of argument	3.60
07/06/23	Cullen D. Speckhart	Receipt and review of Carnival's consolidated appeal brief	0.90



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/07/23	Cullen D. Speckhart	Review emails and materials related to pretrial actions and disclosures and discuss same with E. Lazerowitz	2.40
07/08/23	Cullen D. Speckhart	Review several emails related to deposition notices	0.40
07/09/23	Cullen D. Speckhart	Review inserts for pretrial brief	0.50
07/09/23	Cullen D. Speckhart	Review working draft of objection to standing motion and emails related to same	1.20
07/13/23	Cullen D. Speckhart	Carino deposition	1.50
07/13/23	Cullen D. Speckhart	Confer with E. Lazerowitz and M. Klein re trial prep and various witness considerations	2.10
07/14/23	Cullen D. Speckhart	Confer with E. Lazerowitz re deposition considerations and trial strategy decisions related to credit bidding dispute	3.20
07/14/23	Paul J. Springer	Correspondence with E. Lazerowitz re trial prep	0.10
07/16/23	Cullen D. Speckhart	Call with debtor team and M. Atkinson re deposition prep	1.80
07/16/23	Cullen D. Speckhart	Multiple discussions with E. Lazerowitz re trial considerations	1.50
07/16/23	Evan M. Lazerowitz	Prepare for trial	5.50
07/17/23	Cullen D. Speckhart	Trial prep with litigation team and clients	6.30
07/17/23	Paul J. Springer	Attend pretrial conference	0.70
07/17/23	Evan M. Lazerowitz	Attend pretrial conference	0.60
07/17/23	Evan M. Lazerowitz	Extensive preparation for day 1 of trial	7.50
07/17/23	Denise Cahir	Attend pretrial conference	0.60
07/18/23	Cullen D. Speckhart	Follow up/ prep for trial	3.40
07/18/23	Cullen D. Speckhart	Decurtis trial prep	1.50
07/18/23	Cullen D. Speckhart	Attend DeCurtis trial	8.50
07/18/23	Evan M. Lazerowitz	Prepare for day 2 of trial	4.60
07/18/23	Evan M. Lazerowitz	Attend trial	8.00
07/18/23	Denise Cahir	Attend evidentiary hearing via Zoom	6.10
07/19/23	Cullen D. Speckhart	Listen to court procedures, discuss with E. Lazerowitz and M. Klein	3.30



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	
07/19/23	Evan M. Lazerowitz	Prepare for day 3 of trial	4.70	
07/19/23	Evan M. Lazerowitz	Attend trial	9.00	
07/19/23	Denise Cahir	Attend evidentiary hearing via Zoom	6.90	
07/20/23	Cullen D. Speckhart	Discuss trial proceedings with E. Lazerowitz	0.70	
07/20/23	Evan M. Lazerowitz	Attend trial	7.00	
07/20/23	Evan M. Lazerowitz	Prepare for direct examination of Atkinson and Carino	2.00	
07/20/23	Denise Cahir	Attend evidentiary hearing via Zoom	5.20	
07/24/23	Cullen D. Speckhart	Discuss post trial briefing with E. Lazerowitz and M. Klein	0.80	
07/25/23	Cullen D. Speckhart	Emails with E. Lazerowitz re: status of post-trial pleadings and related briefing actions	0.50	
07/28/23	Cullen D. Speckhart	Review various documents and exhibits related to sale dispute post-trial briefing and pleadings to be filed	1.20	
Task Total:			116.40	145,408.00
Total Fees				\$550,573.00



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Fee Summary:

<u>Timekeeper</u>	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Stephen R. Smith	Partner	1595	36.20	57,739.00
Cullen D. Speckhart	Partner	1600	52.70	84,320.00
Michael Aaron Klein	Partner	1335	34.60	46,191.00
Evan M. Lazerowitz	Associate	1240	157.30	195,052.00
Beth Shrieves	Associate	1080	116.70	126,036.00
Paul J. Springer	Associate	1235	10.80	13,338.00
Xueqing Li	Associate	890	.80	712.00
Marquavious A. Strozier	Associate	780	2.70	2,106.00
Amanda L. Lindner	Associate	670	10.60	7,102.00
Timothy Nguyen	Associate	1235	.50	617.50
Samuel R. Rabuck	Associate	995	2.90	2,885.50
Denise Cahir	Paralegal	380	29.10	11,058.00
Arthur C. Daye	Lit/E-Discovery Svcs.	420	1.00	420.00
Matthew Thompson	Lit/E-Discovery Svcs.	420	5.40	2,268.00
Hitesh Patel	E-Discovery Staff Attorney	560	1.30	728.00

For costs and disbursements recorded through July 31, 2023 :

Ediscovery Technology Services RelOne database	303.20
Monthly Relativity User Access Fee	2,700.00
Monthly RelOne Data Hosting Fee	976.20
Research Database / Document Retrieval	789.28
Train Fare	194.00
Traveler: Lazerowitz/Evan // Train	
Transportation	49.45
Trial Transcript	1,732.60
Re court reporting/transcription services in connection with the deposition of Michael Atkinson conducted on 7/17/23	
Veritext LLC	

Total Costs **\$6,744.73**

Total: **\$557,317.73**



August 17, 2023

Joe Carino
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Orlando, FL 32803

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Invoice Number: 2704477

REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For services rendered-Invoice No. 2704477:

Fees	\$	550,573.00
Chargeable costs and disbursements	\$	6,744.73
Total Due on Current Invoice (USD)	\$	557,317.73

Outstanding Balance from prior Invoices as of 8/17/2023 *(May not reflect recent payments)*

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Balance</u>	<u>Late Charges</u>	<u>Balance Due</u>
2677631	6/30/2023	150,087.70	0.00	150,087.70
2704228	8/17/2023	662,837.07	0.00	662,837.07

Total Outstanding Balance from prior Invoices (Disregard if paid) **\$ 812,924.77**



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Invoice Number: 2704477

Total Amount Due on Current and Prior Invoices (USD) \$ 1,370,242.50

Cooley LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004

Tax ID# 94-1140085

Invoices are due and payable upon receipt. Any unpaid balance after 30 days may
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Account # 4129155206 ABA Routing # 121000248 Swift # WFBIUS6S
**When making electronic payments please provide invoice number(s)
and send remittance advice to AR@cooley.com**

View balances and pay open invoices via Cooley's payment portal:
ww2.e-billexpress.com/ebpp/CooleyLLP

To protect against wire fraud attacks, wiring instructions will not be changed during this transaction.
If you receive updated wire transfer instructions that do not agree to the information on this invoice,
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